

REMARKS/ARGUMENTS

Favorable reconsideration of this application, in light of the following discussion, is respectfully requested.

Claims 1-26 are pending in the present application.

In the outstanding Office Action, Claims 1-8, 11-16, and 18-24 were rejected under 35 U.S.C. §103(a) as unpatentable over Whitmire et al. (U.S. Patent No. 6,167,403, hereinafter Whitmire) in view of Singh et al. (U.S. Patent No. 5,758,083; hereinafter Singh); and Claims 9, 10, 17, and 25 were rejected under 35 U.S.C. §103(a) as unpatentable over Whitmire in view of Singh, and further in view of Compliment et al. (U.S. Patent No. 6,360,260, hereinafter Compliment).

Applicants thank the Examiner for the courtesy of an interview extended to Applicants' representative on August 24, 2005. During the interview, differences between the present invention and the applied art, and the rejections noted in the outstanding Office Action were discussed. Arguments presented during the interview are reiterated below.

The claimed invention has many advantages, including but not limited to those presented below. An advantage of the claimed invention is that network administrators can supplement or replace vendor-defined traps in the network devices with user-defined traps in the network manager. Another advantage is that alerts can be generated under precisely the conditions of importance to the user, rather than according conditions specified by manufacturers of network devices. Furthermore, uniform alerts can be generated even though the network may contain devices from different vendors with different communications protocols and program interfaces, including devices that might not otherwise provide status information.<sup>1</sup>

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<sup>1</sup> Specification, page 5, line 26 to page 6, line 2.

In a non-limiting embodiment of the claimed invention, a video network manager presents various trap attributes that allow the user to specify the conditions that will cause the custom trap to be issued or triggered. Some of the trap attribute objects allow the user to specify different device attributes and thresholds or values to form the basis of trap conditions and trap generation. As shown in Fig. 4, the trap attribute objects may include dialog boxes of other groups of objects, such as device attribute objects 66, system attribute objects 68, network attribute objects 70, and time attribute objects 72. Device attribute objects 66 allow the user to provide values and/or thresholds to be compared with attributes of the device selected through device drop down list 64. System attribute objects 68 relate to attributes of video network manager 24, such as number of threads, disk space, number of software licenses, etc. Network attribute objects 70 include conditions such as overall network workload or traffic volume, pipeline limits, quality of service metrics, etc. For example, network attribute objects 70 may be used to create a trap to indicate that a particular router is underutilized even through overall network traffic exceeds a user-specified value. Time attribute objects 72 include conditions such as time of day, day of week, particular calendar dates, etc. Furthermore, trap definition module 60 provides input objects for the trap attributes of polling frequency, to allow the user to specify how often video network manager 24 is to poll for current conditions pertinent to the trap.<sup>2</sup>

In addition, once the user has finished specifying device attributes and thresholds for the custom trap, trap definition module 60 adds the user defined trap to custom trap list 62. Specifically, as shown for the non-limiting embodiment depicted in Fig. 4, trap definition module 60 includes trap building logic 74, which builds traps and saves traps in custom trap list 62, according to the user specified conditions described above.<sup>3</sup>

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<sup>2</sup> Specification, page 11, lines 11-29, and Fig. 4.

<sup>3</sup> Specification, page 12, lines 6-11.

Turning now to the outstanding grounds of rejection, Applicants respectfully traverse the outstanding ground of rejection because the outstanding Office Action fails to provide a *prima facie* case of obviousness by asserting prior art that, no matter how the prior art references are combined, does not teach every element of independent Claims 1, 11, and 18.

To establish a *prima facie* case of obviousness, M.P.E.P. §2143 requires that three criteria must be met. First there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine the references teachings. Second, there must be a reasonable expectation of success. Finally, the prior art references must teach or suggest all the claim elements.

Claim 1 recites, *inter alia*, “customizing a trap for use as a custom trap, said step of customizing including selecting device attributes and thresholds using a graphic user interface.”

Applicants respectfully point out that the verb customize has a dictionary definition of “to modify, make or build accordingly to individual specifications or preference.”<sup>4</sup> Customizing is not selecting between predetermined options.

Applicants acknowledge that the outstanding Office Action states that Whitmire does not explicitly disclose the claimed “customizing a trap for use as a custom trap, said step of customizing including selecting device attributes and thresholds using a graphic user interface.”

Whitmire only describes a network device where a user can select from pre-defined traps. The management platform 116 sends an SNMP SET request to program the trap support value (not the trap itself) to (1) to select MIB M1 1310 type traps and to (2) to select

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<sup>4</sup> Random House Webster’s College Dictionary, 2<sup>nd</sup> ed., April 1999, page 328.

the MIB M4 1316 traps.<sup>5</sup> The user of the system described in Whitmire cannot customize any of the traps. The user only selects between predefined traps.

Singh does not cure the deficiency of Whitmire. Singh describes a system for sharing information between multiple network management stations. The network management system is capable of forwarding three types of information between network management stations. The first type of information is network management (NM) events. NM events are generated by agents in response to NM event requests from network managers when conditions specified by the event requests are satisfied. The second type of information is a trap. An example of a trap is a SNMP link down trap. The third type of information is a NM database trap.<sup>6</sup>

A sender process 326 filters the network management information (events and traps) received from the event dispatcher in the sending station shown in Fig. 3. The sender process reformats all traps and NM events into NM traps before forwarding them to the event dispatcher in the receiving station.<sup>7</sup> The reformatting only adds an indicator to the event information so that the receiving station can easily identify that the event or trap was forwarded from a sending station. The reformatting does not describe or suggest any “customizing,” let alone customizing that includes selecting device attributes and thresholds using a graphical user interface.

Singh further describes that the above-mentioned filtering operation filters network management information (events and traps) so that only the network management information requested by the receiver process (receiving stations) remaining after the filtering

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<sup>5</sup> Whitmire, col. 27, lines 51-54.

<sup>6</sup> Singh, col. 6, lines 39-63.

<sup>7</sup> Singh, col. 10, lines 21-37 and col. 11, lines 21-33.

process.<sup>8</sup> Singh describes that to implement filtering, a filtering table includes fields that determine whether a trap or event is forwarded.

Filtering is another form of selecting between predefined traps. Singh describes 6 types of pre-defined NM database traps (add, background, create, change, delete, and load). When sender process 326 receives NM database traps from event dispatcher 312, the sender process 326 uses filter file 330 specified for receiving station 304 to determine which database template file to use in processing the database trap. The database template file, not the trap, allows a user to specify additional topology information to be forwarded to the receiving station.<sup>9</sup>

Table 1 shows an example of the format of a database template file. The keywords membership, color, agents, attributes, connections, and drop determine the forwarded content for each of the trap types.<sup>10</sup> The database template file is modified and not the trap. As shown in Figs. 5, 7, and 8B, the predefined traps already exist prior to the filtering. The NM traps obtain data according to their predefined criteria, and then filtering is applied.<sup>11</sup>

Thus, filtering does not teach or suggest “customizing,” let alone customizing that includes selecting device attributes and thresholds using a graphical user interface.

Furthermore, Singh only describes using a GUI to configure a sender and receiver processes of the network management system, and that by using a GUI, the end-user is able to configure the information sharing provided by the invention with minimal effort. This does not teach or suggest “customizing a trap for uses as a custom trap, said step of customizing including selecting device attributes and thresholds using a graphical user interface.”

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<sup>8</sup> Singh, col. 13, lines 2-6.

<sup>9</sup> Singh, col. 14, line 49 to col. 15, line 10.

<sup>10</sup> Singh, col. 15, lines 25-46, and table 1.

<sup>11</sup> Singh, Fig. 5, particularly see steps 508, 516, and 518.

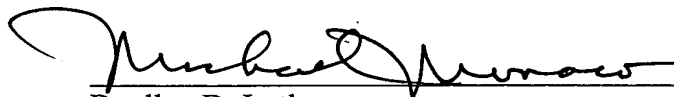
Furthermore, Compliment does not cure the deficiencies of Whitmire and Singh.  
Compliment describes registering an SNMP device and does not describe or suggest "custom traps."

In view of the above-noted distinctions, Applicants respectfully submit that amended Claim 1 (and dependent Claims 2-10) patentably distinguish over Whitmire, Singh, and Compliment, alone or in combination. Applicants also submit that independent Claims 11 and 18 (and dependent Claims 12-17 and 19-26) patentably distinguish over Whitmire, Singh, and Compliment, alone or in combination, for at least the reasons given for Claim 1.

Consequently, in light of the above discussion, the present application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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